

HOGAN & HARTSON

L.L.P.

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, D.C. 20004-1109
TEL. (202) 637-5600
FAX. (202) 637-5910

November 19, 2001

BY ELECTRONIC MAIL
to FR0001@ustr.gov

Ms. Gloria Blue
Executive Secretary
Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 Seventeenth Street, N.W.
Washington, D.C. 20508

**Re: Steel 201 – Relief Recommendations Under Section 203 – Exclusion
Requests for Certain Carbon and Alloy Steel Flanges (Product 22)
and Certain Stainless Steel Flanges (Product 33)**

Dear Ms. Blue,

On November 13, 2001, the Association of European Quality Flange Producers ("the Association") submitted exclusion requests in the above-captioned proceeding for certain categories of carbon and alloy steel flanges (Product 22) and certain stainless steel flanges (33). It has since been brought to our attention that there were errors in the listing of producers provided in response to question (d). To correct the record, we provide in an attachment hereto a revised response to question (d) in which we have listed the correct U.S. and foreign producers of these products based upon the information available to the Association.

Should you have any further questions or concerns regarding this matter, please do not hesitate to contact the undersigned.

Respectfully Submitted,

/s/ *Lewis E. Leibowitz*

Lewis E. Leibowitz
Craig A. Lewis
Jeremy B. Zucker

*Counsel for the Association of European Quality
Flange Producers*

Attachment

NON-CONFIDENTIAL

**Association of European Quality Flange Producers
Product Exclusion Requests**

Corrected Response to Question (d)

CARBON AND ALLOY STEEL FLANGES

(d) Names and locations of any producers, in the United States and in foreign countries, of the product:

Based upon information available to the European Flange Producers, U.S. and foreign manufacturers of the products for which exclusion has been requested include the following:

(1) Carbon or Alloy Steel Flanges for the Approved Market 1/

U.S.

Boltex, Inc.
Coffer
National Flange
Texas Metal Works
Western Forge

Non-U.S.

Bebitz (Germany)
Geldbach, Friedrich (Germany)
Geldbach, Wilhelm (Germany)
Kofco (Korea)
Metalfar (Italy)
MGI (France)
ULMA Forja (Spain)

(2) Large Diameter Flanges

U.S. 2/

Ameriforge
Boltex
Weldbend
National Flange
Coffer Corp.

Non-U.S.

(Same as above)

1/ Multiple approvals by oil companies, petrochemical, and chemical industries..

2/ No U.S. manufacturing capacity to produce flange forgings over 34 inches.

NON-CONFIDENTIAL

STAINLESS STEEL FLANGES

(d) **Names and locations of any producers, in the United States and in foreign countries, of the product:**

Based upon information available to the European Flange Producers, U.S. and foreign manufacturers of the products for which exclusion has been requested include the following:

(1) Stainless Steel Flanges for the Approved Market 3/

U.S.

Ideal Forge
Maas Flange and Fittings
Texas Metals
Western Forge

Non-U.S.

Bebitz (Germany)
Kofco (Korea)
Metalfar (Italy)

(2) Large Diameter Flanges

U.S. 4/

Maass Flange
Texas Metals

Non-U.S.

(Same as above))

(3) Flange Forgings

The only known U.S. suppliers of stainless steel flange forgings are Maass Flange Corporation, Ideal Forging Corporation, and Texas Metals. Foreign manufacturers of flange forgings include the following:

Bebitz (Germany)
Maass Flange (Mexico)
Metalfar (Italy)
Geldbach, Wilhelm (Germany)
Kofco (Korea)
MGI (France)
Melesi (Italy)

There are also several producers of flange forgings located in India.

3/ Multiple approvals by oil companies, petrochemical, and chemical industries..

4/ No significant U.S. manufacturing capacity to produce flange forgings over 20 inches.

NON-CONFIDENTIAL